

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

ADREA, LLC,

*Plaintiff,*

v.

BARNES & NOBLE, INC.,  
BARNESANDNOBLE.COM LLC, and NOOK  
MEDIA LLC,

*Defendants.*

Civil Action No. 13-CV-4137 (JSR)

JURY TRIAL DEMANDED

ECF CASE

**NOTICE OF MOTION FOR PARTIAL SUMMARY JUDGMENT OF INFRINGEMENT  
AND PARTIAL SUMMARY JUDGMENT OF NO INVALIDITY**

PLEASE TAKE NOTICE that, pursuant to Fed. R. Civ. P. 56(a) and Local Rule 56.1, plaintiff ADREA, LLC (“Plaintiff”) will move the Court, on January 31, 2014, for: (1) partial summary judgment of infringement of certain asserted claims of U.S. Patent Nos. 7,299,501 and 7,620,703 by Barnes & Noble, Inc., barnesandnoble.com llc, and Nook Media LLC (“Defendants”); and (2) partial summary judgment of no invalidity of certain asserted claims of U.S. Patent Nos. 7,298,851, 7,299,501, and 7,620,703.

Pursuant to the Court’s Civil Case Management Plan (D.I. 20), as amended by the Court on December 13, 2013, the schedule for the proceedings relating to this motion is as follows:

- Plaintiff’s moving papers shall be served and filed on January 31, 2014;
- Defendants’ responsive papers shall be served and filed on February 14, 2014;
- Plaintiff’s reply papers shall be served and filed on February 21, 2014; and
- Oral argument shall be heard on February 28, 2014, beginning at 4:00 PM.

Dated: January 24, 2014

Respectfully submitted,

/s/ Steven M. Bauer

Steven M. Bauer  
Kimberly A. Mottley (*pro hac vice*)  
Patrick J. Niedermeier (*pro hac vice*)  
Micah Miller (*pro hac vice*)  
Erin Staab (*pro hac vice*)  
PROSKAUER ROSE LLP  
One International Place  
Boston, Massachusetts 02110  
(617) 526-9600 (telephone)  
(617) 526-9800 (facsimile)  
sbauer@proskauer.com  
kmottley@proskauer.com  
pniedermeier@proskauer.com  
mmiller@proskauer.com  
estaab@proskauer.com

Colin Cabral  
PROSKAUER ROSE LLP  
2049 Century Park East, Suite 3200  
Los Angeles, CA 90067  
(310) 284-5611 (telephone)  
(310) 557-2193 (facsimile)  
ccabral@proskauer.com

Kenneth Rubenstein  
Baldassare Vinti  
PROSKAUER ROSE LLP  
11 Times Square  
New York, NY 10036  
(212) 969-3000 (telephone)  
(212) 969-2900 (facsimile)  
krubenstein@proskauer.com  
bvinti@proskauer.com

*Attorneys for Plaintiff ADREA, LLC*

**CERTIFICATE OF SERVICE**

I certify that on January 24, 2014, I caused a copy of the forgoing document to be served upon counsel of record for Barnes & Noble, Inc., barnesandnoble.com llc, and Nook Media LLC by electronic means using the Court's ECF system:

Louis S. Ederer  
Susan Lee Shin  
Yue-Han Chow  
Maxwell Charles Preston  
ARNOLD & PORTER LLP  
399 Park Avenue  
New York, NY 10022-4690  
Telephone: (212) 715-1000  
Facsimile: (212) 715-1399  
louis.ederer@aporter.com  
susan.shin@aporter.com  
yue-han.chow@aporter.com  
maxwell.preston@aporter.com

Ali R. Sharifahmadian (*pro hac vice*)  
Sarah Brackney Arni (*pro hac vice*)  
ARNOLD & PORTER LLP  
555 Twelfth Street, NW  
Washington, DC 20004-1206  
Telephone: (202) 942-5000  
Facsimile: (202) 942-5999  
ali.sharifahmadian@aporter.com  
sarah.arni@aporter.com

Michael A. Berta, Jr. (*pro hac vice*)  
Willow W. Noonan (*pro hac vice*)  
ARNOLD & PORTER LLP  
Three Embarcadero Center, 10<sup>th</sup> Floor  
San Francisco, CA 94111-4024  
Telephone: (415) 471-3100  
Facsimile: (415)-471-3400  
michael.bertha@aporter.com  
willow.noonan@aporter.com

*Attorneys for Defendants Barnes & Noble, Inc.,  
barnesandnoble.com LLC, and Nook Media LLC*

/s/ Steven M. Bauer